

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, SHARON
HAMMONDS, BRENDA F. WATKINS,
LIMESTONE UNIVERSITY, MG
FREESITES, LTD., d/b/a
PORNHUB.COM, MG FREESITES II
LTD., MINDGEEK S.A.R.L., MINDGEEK
USA, INC., MG BILLING LTD. d/b/a
XHAMSTER.COM, TRAFFICSTARS
LTD., WISEBITS LTD, XHAMSTER IP
HOLDINGS LTD, WISEBITS IP LTD,**

Case No: 7:20-cv-00947-DCC

**LIMESTONE UNIVERSITY f/k/a
LIMESTONE COLLEGE, SHARON
HAMMONDS, and BRENDA
WATKINS' CERTIFICATE OF
SERVICE OF EXPERT REPORT**

Defendants.

Defendants **Limestone University, Sharon Hammonds, and Brenda F. Watkins,**
Defendants in the above-styled civil action, disclose the following expert witness under Rule
26(a)(2) and certifies that written reports prepared and signed by its expert witness has been served
upon the other parties.

The above-referenced Defendants disclose the following expert:

**Dr. Steve Albrecht, SHRM PHR, ASIS CPP, ATAP CTM
901 E. Saint Louis Street, Suite 107
Springfield, MO 65806**

**Dr. Albrecht is a security consultant and workplace violence prevention trainer as
well as a Human Resources consultant and trainer. He is expected to testify regarding the
reasonableness of Defendants' hiring and supervision of Collins Murphy, as well as address
the substance of Plaintiffs' identified experts' opinions. Dr. Albrecht's opinions are more**

fully contained in the written report served upon the other parties pursuant to Rule 26(a)(2)(B).

This 18th day of March, 2024.

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/s/ JOSEPH Y. RAHIMI II
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